

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X Case No. **1:24-cv-01115-JRC**

VALERIA LOPEZ, KAREN MOLINA,  
ANGELICA PEREZ and  
MICHAEL VALENCIA,

*Plaintiffs,*

**AFFIRMATION IN SUPPORT  
OF REQUEST FOR CERTIFICATE  
OF DEFAULT**

-against-

TAQUERIA LA NORTENA, CORP and  
GUILLERMO LOPEZ, Individually,

*Defendants.*

-----X

**LINA STILLMAN**, being duly sworn, deposes and says:

I am an attorney duly admitted to practice in the Courts of the State of New York and in the Federal Court of the Southern and Eastern Districts of New York. I am a Partner at STILLMAN LEGAL P.C., the attorneys for Plaintiffs VALERIA LOPEZ, KAREN MOLINA, ANGELICA PEREZ, and MICHAEL VALENCIA ("Plaintiffs") in the above-entitled action. As such, I am familiar with all the facts and circumstances of this action.

2. This action for claims arising under the Fair Labor Standards Act (FLSA) was commenced by the filing of the summons and complaint on February 13, 2024.

3. Defendant TAQUERIA LA NORTENA, CORP, was duly served with a copy of the Summons and Complaint on February 16, 2024, pursuant to NY Bus. Corp. Law § 306(b)(1) and Fed. R. Civ. P. Rule 4(e)(1). Proof of Service was filed with the Court on February 25, 2024 (ECF No. 7). Defendant GUILLERMO LOPEZ was duly served with a copy of the Summons and Complaint on February 16, 2024, pursuant to NY Bus. Corp. Law § 306(b)(1) and Fed. R. Civ. P. Rule 4(e)(1). Proof of Service was filed with

the Court on February 25, 2024 (ECF No. 8).

4. Defendants TAQUERIA LA NORTENA, CORP, and GUILLERMO LOPEZ were issued with an electronic summons on February 13, 2024, served pursuant to NY CPLR 308(2) and Fed. R. Civ. P. Rule 4(e)(1) (ECF No.6).

5. Defendants TAQUERIA LA NORTENA, CORP, and GUILLERMO LOPEZ have not appeared herein, moved, and/or answered the Complaint and the time within which to do so has expired and has not otherwise been extended.

6. Defendants TAQUERIA LA NORTENA, CORP, and GUILLERMO LOPEZ are not infant or incompetent and are not presently in the military service of the United States, as appears from the facts in this litigation.

**WHEREFORE**, Plaintiffs VALERIA LOPEZ, KAREN MOLINA, ANGELICA PEREZ, and MICHAEL VALENCIA respectfully request that the default of Defendant TAQUERIA LA NORTENA, CORP, and GUILLERMO LOPEZ be noted and that the Clerk of the Court issue a Certificate of Default forthwith.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief, that the amount claimed is justly due to the plaintiff, and that no part thereof has been paid.

Dated: New York, New York  
March 28, 2024



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